

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

USA

Plaintiff,

Case No. 22-20355

-vs-

Hon. Matthew F. Leitman

SEMAJE REFFIGEE,

Defendant.

SENTENCING MEMORANDUM
VARIANCE (18 U.S.C. § 3553)

Defendant Semaje Reffigee pled guilty to a one count information charging her with Conspiracy to Commit Wire Fraud in violation of 18 U.S.C. § 1349.

The presumptive guideline range is 27 months to 33 months. The amount of loss was \$313,497.00.

Defendant Semaje Reffigee has no prior criminal record, approximately 26 years of age and is the devoted mother of a seven-year-old. She currently resides with her grandmother and disabled uncle, and was residing at this premise during the course of the criminal violations.

The following were extracted from the Presentence Investigation Report, ECF 22, in support of request for variance:

20. **Adjustment for Acceptance of Responsibility**

The defendant clearly demonstrated acceptance of responsibility for her offense and has assisted authorities in the investigation or prosecution of her own misconduct by timely notifying authorities of her intention to enter a plea of guilty, thereby permitting the

government to avoid preparing for trial and permitting the government and the court to allocate their resources efficiently.

40. **Personal and Family Data**

Reffigee reported that her family is aware of instant case and provide her with moral support. Reffigee reports spending most of her time with her grandmother, Alfreda Baldrige, who resides next door, and with her daughter. When asked to describe how she felt about the offense, Reffigee replied, "I feel really ashamed about this offense. I feel like this was very unnecessary of me and out of character. This offense has impacted my friends and family in a negative way. They are really disappointed. Peers and people around me began to influence my decisions. I could have abided by the work policy and not told anyone what my job was. In the future, I will always do the right thing. I will know how to say no and think for myself."

43. If sentenced to a term of imprisonment, Reffigee states "I will focus on a degree in Business and also learn how to manage my finances better by reading financial books. I will also focus on doing everything I can to get back home to be the best mom to my daughter. I would like the judge to know that I am a great mom. I am a good citizen in society. I do my very best to take accountability and correct my mistakes. I am young and still learning but this offense has taught me a lot."

The above are strongly evident of the basis for request for variance indicating immediate acceptance of responsibility, as well as expressions of remorse and intention to learn from this mistake, to be a better citizen, person and "best mom."

Defendant further indicated that after the first positive testing for marijuana, she was tested three times thereafter with negative results which should be considered in support of her expression of remorse, as well as intension to comply with the law to be a better overall person.

It should be further considered by this Honorable Court that the money pocketed by Defendant Semaje Reffigee was used solely for maintenance and support regarding her responsibilities as mother and tenant in her grandmother's house, and to provide care

and attention to her disabled uncle who is paralyzed on his left side due to a stroke and ambulates with a cane. None of the monies were used for “bling” or other extravagant indulgences or unnecessaries.

Defendant Semaje Reffigee further participated in a proffer and implicated others involved and offered to be a cooperating witness, but as of this date, there is no indication that prosecution has been initiated against others involved in the fraud.

Enclosed herewith are character references in support of Sentencing Memorandum with request for variance (18 U.S.C. § 3553) (Exhibit A).

This Honorable Court should consider with regard to request for Variance are those set forth in the PSR as previously outlined. Most specifically, Defendant’s adjustment for Acceptance of Responsibility, as well as Personal and Family Data.

Defendant Semaje Reffigee respectfully asks this Honorable Court to impose a sentence of one year and one day with corresponding supervised release which will reflect the seriousness of the offense, as well as to promote justice for the law and provide appropriate punishment, and further that the place of incarceration should be in close proximity to her residence.

THOMAS LEGAL CENTERS, P.C.

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Dated: July 11, 2023

CERTIFICATE OF MAILING

I certified that a copy of Sentencing Memorandum Variance (18 U.S.C. § 3553) and this Certificate of Mailing was mailed to all attorneys of record on this date of July 11, 2023 by electronic and/or ordinary mail.

s/Joyce J. Crechiolo
Secretary to Thomas W. Jakuc
(586) 573-2694

Dated: July 11, 2023